

Erica D. Klein (EK 6902)
eklein@brookskushman.com
Rebecca J. Cantor (NY4698130)
rcantor@brookskushman.com
Marc Lorelli
mlorelli@brookskushman.com
BROOKS KUSHMAN P.C.
1000 Town Center
Twenty-Second Floor
Southfield, Michigan 48075
Tel: (248) 358-4400
Fax: (248) 358-3351
Attorneys for Defendant
The Kooples USA, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHROME HEARTS LLC, a Delaware
Limited Liability Company,

Plaintiff,

v.

THE KOOPLES USA, INC., a Delaware
Corporation; and DOES 1-10, inclusive,

Defendant.

CASE NO. 1:19-CV-03263-JGK

**STIPULATION FOR EXTENSION OF
TIME TO ANSWER OR OTHERWISE
RESPOND TO COMPLAINT**

Plaintiff Chrome Hearts LLC (“Chrome Hearts”) filed a Complaint (the “Complaint”) dated April 11, 2019 alleging trademark infringement and unfair competition. Defendant The Kooples USA, Inc. (“The Kooples”) requested additional time to prepare its response to the Complaint, and Plaintiff’s counsel agreed that The Kooples shall answer or otherwise respond to the Complaint by June 6, 2019.

In view of this request and acknowledgment, IT IS HEREBY STIPULATED by and between the parties hereto through their respective attorneys of record that the date for Defendant The Kooples to answer or otherwise respond to the Complaint be extended to June 6, 2019.

By: /s/ Brent Blakely with consent
Brent Blakely (BB 1966)
BLAKELY LAW GROUP
1334 Parkview Avenue
Suite 280
Manhattan Beach, CA 90266
Tel: (310) 546-7400
Fax: (310) 546-7401

*Attorneys for Plaintiff
Chrome Hearts LLC*

By: /s/ Rebecca J. Cantor
Erica D. Klein (EK 6902)
eklein@brookskushman.com
Rebecca J. Cantor (NY4698130)
rcantor@brookskushman.com
Marc Lorelli (MI Bar P63156)
mlorelli@brookskushman.com
BROOKS KUSHMAN P.C.
1000 Town Center
Twenty-Second Floor
Southfield, MI 48075
Tel: (248) 358-4400
Fax: (248) 358-3351

*Attorneys for Defendant
The Kooples USA, Inc.*

Dated: May 7, 2019

CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that on May 7, 2019, I electronically filed the foregoing STIPULATION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT with the Clerk of the Court for the Southern District of New York using the ECF System which will send notification to the registered participants of the ECF System as listed on the Court's Notice of Electronic Filing.

I also certify that I have mailed by United States Postal Service the paper to the following non-participants in the ECF System: None.

BROOKS KUSHMAN P.C.

/s/ Rebecca J. Cantor

Erica D. Klein (EK 6902)

eklein@brookskushman.com

Rebecca J. Cantor (NY4698130)

rcantor@brookskushman.com

Marc Lorelli (MI Bar P63156)

mlorelli@brookskushman.com

1000 Town Center

Twenty-Second Floor

Southfield, MI 48075

Tel: (248) 358-4400

Fax: (248) 358-3351

Attorneys for Defendant

The Kooples USA, Inc.